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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

No. MD-15-02641-PHX-DGC

**JOINT MOTION TO EXTEND TIME
ALLOTTED FOR PLAINTIFFS'
RESPONSE AND DEFENDANTS' REPLY
TO DEFENDANTS' MEMORANDUM TO
SEAL DOCUMENTS LODGED UNDER
SEAL IN SUPPORT OF PLAINTIFFS'
OMNIBUS SEPARATE STATEMENT OF
FACTS IN SUPPORT OF PLAINTIFFS'
RESPONSES TO DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGEMENT IN THE BELLWETHER
CASES**

23
24 Parties submit this Joint Motion to Extend Time Allotted for Plaintiffs' Response
25 and Defendant's Reply to Defendants' Memorandum to Seal Documents Lodged Under
26 Seal in Support of Plaintiffs' Omnibus Statement of Facts In Support of Plaintiffs'
27 Responses to Defendants' Motions for Summary Judgment in the Bellwether Cases.
28

1 The parties stipulate to extend the allotted fifteen (15) day requirement, as defined
2 in the Protective Order (Dkt. 268) and consistent with LRCiv 5.6(d) and LRCiv 7.2, to
3 allow for additional time to review the 712 pages of redacted exhibits lodged under seal.

4 The parties agree to an extension of one (1) week with a due date of Friday,
5 November 17 for Plaintiffs' Response. To avoid Defendants' Reply deadline conflicting
6 with the Thanksgiving holiday, the parties stipulate to extend the due date to the following
7 week; Defendants' Reply will be due Friday, December 1.

8 RESPECTFULLY SUBMITTED this 9th day of November, 2017.

9 GALLAGHER & KENNEDY, P.A.

10 By: /s/ Mark S. O'Connor

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8 *Peripheral Vascular, Inc.*

9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on this 9th day of November, 2017, I electronically transmitted
11 the attached document to the Clerk's Office using the CM/ECF System for filing and
12 transmittal of a Notice of Electronic Filing.

13 /s/ Gay Mennuti